

*Remediation Plan
file*

Blue

COPY

EDWARD J. EGAN
ATTORNEY AT LAW
1703 E. SECOND STREET
SCOTCH PLAINS, NEW JERSEY 07076
(201) 322-5924

March 5, 1984

David W. Reger
Deputy Attorney General
State of New Jersey
Department of Law and Public Safety
Division of Law
Environmental Protection Section
Richard J. Hughes Justice Complex
CN 112
Trenton, New Jersey 08625

Re: State of New Jersey, Department of Environmental Protection
vs. Scientific Chemical Processing

Dear Mr. Reger:

This letter is intended as an update on the progress of the cleanup of the Carlstadt site being paid for by my client, Inmar Associates, Inc.

My client is advised that, in regard to the material in the tanks and tank wagons, the aqueous portion must first be removed before the sludge can be addressed. To that end, Waste Conversion, Inc. has prepared and submitted to the Pennsylvania Department of Environmental Resources a module permitting the aqueous phase to be disposed of. The aqueous phase consists of approximately 100,000 gallons or 38% of the total volume in the tanks and tank wagons. A response is expected within the next day or two. Removal would begin immediately once the manifests are signed by Scientific Chemical Processing, Inc. or some other entity. I enclose a copy of the submittal which contains the analytical data on the aqueous phase.

In regard to the drums, my client has been advised that over 40 contain nothing but rainwater and would be disposed of with the aqueous portion. As to the remaining 63 drums, I enclose the letter with analytical attachment dated March 1, 1984 which S&W Waste, Inc. has provided my client. S&W Waste, Inc. has proposed removing the 63 drums to its site in South Kearny where the drums would be emptied and the contents solidified. The contents would be then sent in bulk to an approved landfill. The drums would be flattened and disposed of in an approved landfill. To assure a rapid removal, my client has arranged for a backup contractor as to this phase of the cleanup. These 63 drums can be removed immediately, again subject only to the signing of the manifests by Scientific Chemical Processing, Inc. or some other entity.

In regard to the material in the tanks and tank wagons other than the aqueous, the tanks and tank wagons as well as the sludge can be removed only

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David W. Reger, Deputy Attorney General
March 5, 1984
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only after the weather warms up so that the sludge becomes more fluid and hence pumpable. As I already informed you, my client understands the sludge is water washed paint sludge. Delays with S&W Waste, Inc. have caused the final test results to be unavailable to my client. Hence, my client has nothing to supply to the Department at this point. I can assure you my client continues to press S&W Waste, Inc. to complete its undertaking in that regard.

All in all, while I am sure both the Department and my client would like to have the cleanup completed, I believe progress is being made. I trust you will find this information adequate to have the hearing regarding Carlstadt postponed from the scheduled date.

Yours truly,

Edward J. Egan

EJE/rq
Encls.

PA DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
MODULE 1

DATE PREPARED 2-22-84
DATE REVISED

DEPARTMENT USE ONLY

REQUEST FOR APPROVAL TO TREAT, STORE, OR DISPOSE OF A HAZARDOUS OR RESIDUAL WASTE STREAM

SEE INSTRUCTIONS BEFORE COMPLETING THIS FORM

I. GENERAL INFORMATION (must be completed by TSD facility)

A. Treatment, Storage, or Disposal Site

- Name of facility WASTE CONVERSION, INC.
Address 2869 Sandstone Drive, Hatfield, Pa. 19440
Municipality Hatfield County Montgomery
- Identification number (if applicable) PAID085690592
- Solid waste permit number(s) for treatment, storage or disposal facility to be utilized
300694
- Facility contact person
Name Jeffrey S. Fitch Title Asst. General Mgr.
Phone no. 215-822-8996

B. Generator of the Waste

- Name of company Scientific Chemical Processing, Inc.
Mailing address 411 Wilson Avenue, Newark, N.J.
Location of site if different
from mailing address 216 Paterson Plant Road, Carlstadt, New Jersey
Municipality Carlstadt County Bergen
- If a subsidiary, name
of parent co. N/A
- Identification number (if applicable) NJT000009142
- Company contact person (Landowner)
Name George Turpak title Clean Up Coordinator
Phone no. 201-828-0851

DATE PREPARED 2-22-84
DATE REVISED

DEPARTMENT USE ONLY

II. WASTE DESCRIPTION (Must be completed by Generator)

A. General Properties

1. pH range <2 to _____ (based on past analyses or knowledge)
2. Physical state:
 - a. ☒ liquid (less than 20% solids by dry wt. or flowable)
 - c. ☐ solid (equal to or greater than 20% by dry wt. and non-flowable)
 - b. ☐ gas (ambient temperature and pressure)
 - d. ☐ Check here if c. above was checked and waste contains free liquids.
3. Physical appearance:

Color yellow-orange Odor acetone/ester

Number of solid or liquid phases of separation N/A

Describe each phase of separation
N/A
4. U.S. DOT proper shipping name UN/NA number, and hazard class (if applicable):

Waste corrosive liquid, NOS
Corrosive Material UN 1760
5. Typical volume of waste to be shipped to treatment storage or disposal facility:
 - a. Monthly variable gal., tons (circle one)
 - b. Annually 100,000 gal. tons (circle one)
6. Treatment or disposal frequency: variable times per year; ☒ one time
7. Current volume to be shipped to treatment storage or disposal facility 10,000 gal., tons (circle one)
8. a. Is the waste a hazardous waste as defined in 75.261? ☒ Yes ☐ No
 - b. If yes, describe the hazardous waste according to its description and hazardous waste number in 75.261.

D002, Corrosive	D007, Chromium
D006, Cadmium	D008, Lead
9. Has the waste been delisted as a hazardous waste by DER? ☐ Yes ☒ No ☐ N/A
If yes or N/A, check the appropriate box(es) in Item 10.

DATE PREPARED

2-22-84

DATE REVISED

DEPARTMENT USE ONLY

10. Is the waste a residual waste or a delisted hazardous waste? ☐ Yes ☐ No
If yes, check the following box(es) as applicable:

- | | |
|--|--|
| <input type="checkbox"/> discarded commercial chemical product | <input type="checkbox"/> process waste |
| <input type="checkbox"/> tank bottom | <input type="checkbox"/> infectious waste |
| <input type="checkbox"/> off-specification species | <input type="checkbox"/> baghouse dust |
| <input type="checkbox"/> manufacturing chemical intermediate | <input type="checkbox"/> wastewater treatment plant residue (industrial) |
| <input type="checkbox"/> still bottom | <input type="checkbox"/> wastewater treatment plant residue (sewage) |
| <input type="checkbox"/> spent catalyst | <input type="checkbox"/> water treatment plant residue |
| <input type="checkbox"/> flyash | <input type="checkbox"/> incinerator residue |
| <input type="checkbox"/> bottom ash | <input type="checkbox"/> acid mine drainage treatment sludge |
| <input type="checkbox"/> slag | <input type="checkbox"/> spill residue |
| <input type="checkbox"/> foundry sand | <input type="checkbox"/> other (specify) _____ |
| <input type="checkbox"/> SO ₂ scrubber sludge | |

B. Chemical Analyses — *Please attach the following:*

1. The results of the total analysis of the waste as described in the instructions.

See Attached

2. The results of the leaching tests as described in the instructions and the leaching method.

Not Required

3. A description of the sampling method.

Samples taken in accordance to all standard protocols.

4. The range of concentrations of the constituents based on knowledge or past analyses.

Not Available

C. Process Description and Schematic — *Please attach the following:*

1. The substantiation for a confidentiality claim as described in the instructions, if portions of the information you have submitted are confidential.

Not Applicable

2. A detailed description of the manufacturing and/or pollution control processes producing the hazardous or residual waste as specified in the instructions.

See Attached

3. A schematic of the manufacturing and/or pollution control processes producing the hazardous or residual waste as specified in the instructions.

See Attached

III. Liner Compatibility Evaluation (must be completed by TSD facility)

Attach the results of the liner compatibility evaluation or supporting data as specified in the instructions.

Not Applicable

DATE PREPARED 2-22-84
DATE REVISED

IV. PROPOSED TREATMENT, STORAGE, AND/OR DISPOSAL METHOD (must be completed by TSD facility. Use additional sheets if necessary.)

A. Proposed Treatment Method

1. Pump to M/T reactor and lower pH < 5 with waste iron bearing acid.
2. Add KMnO_4 as oxidizing agent and mix 60 minutes.
3. Add powdered activated carbon and mix 60 minutes.
4. Adjust pH down with lime slurry.
5. Add Na_2S and polymer, mix 15 minutes and stop mixer.
6. Allow to settle and draw off supernate to effluent holding tank for gradual discharge to sewer.
7. Filter sludge via RDVF and pump filtrate to effluent holding tank as in Step 6 above.

B. Proposed Storage Method and Length of Storage

N/A

C. Proposed Disposal Method

Pump filtrate and supernate to HTMA via sewer.

V. ALTERNATIVES TO PROPOSED TREATMENT AND/OR DISPOSAL METHOD (must be completed by generator. Use additional sheets if necessary.)

- A. What Other Treatment, Disposal, Recycle, Reuse, or Reclamation Method(s) Can be Used?**
Briefly describe viable alternatives to your proposal.

N/A

- B. Why was the Treatment and/or Disposal Method in Section IV Chosen?**

Most Cost Effective At This Time.

LANDLORD

VI. CERTIFICATION OF ~~GENERATOR~~

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name of Responsible
Official

George Terpak, Jr.

INMAR ASSOCIATES, INC.

Title Cleanup Coordinator

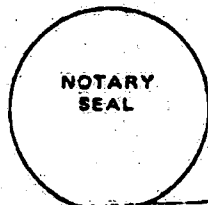
Signature

George Terpak, Jr.

Date

2/24/84

Taken, sworn and subscribed before me, this



24 day of February A.D. 1984

Marie Boring
 My Commission Expires February 2, 1987
 NOTARY PUBLIC OF NEW JERSEY
 MARIE BORING

VII. CERTIFICATION OF REGISTERED PROFESSIONAL ENGINEER FOR TREATMENT STORAGE AND/OR DISPOSAL FACILITY

This is to certify that I have personally reviewed all engineering information contained in the accompanying modules, drawings, specifications, and other documents which are part of this application and that I have found it to be of good engineering quality, true and correct, and is in conformance with the requirements of the Department of Environmental Resources, and it does not, to the best of my knowledge, withhold information that is pertinent to a determination of compliance with the requirements of the Department.

NOTICE: It is an offense under Pennsylvania Crimes Code to affirm a false statement in documents submitted to the Department.

Name

A. C. Schultes, III, P.E.

Signature

A. C. Schultes, III

Date

February 22, 1984

Address

664 South Evergreen Avenue,

P. O. Box 411

Woodbury, New Jersey 08096

Phone No.

609-845-5656

 SEAL OF PA REGISTERED
 PROFESSIONAL ENGINEER

Waste Conversion INC.

2869 Sandstone Drive / Hatfield, Pennsylvania 19440 / 215-822-8996

Waste Generator: SCP - Carlstadt

Waste Identification: Aqueous Composite

Lab Code: 2326

Test Parameter	Total Analysis	Treated Sample	E/P Leachate
Total Residue	5.70%	NOT DETERMINED	
Total Dissolved Solids	5.00%	NOT DETERMINED	
Total Volatile Solids	3.07%	NOT DETERMINED	
pH	2.0	9.0	
Cyanides	37.7 mg/l	NOT DETERMINED	
Oil & Grease	1,420 mg/l	<10 mg/l	
Ammonia, N	58.2 mg/l	NOT DETERMINED	
Phenol	395 mg/l	59.9mg/l	
Arsenic	0.24 mg/l	<0.0005 mg/l	
Antimony	0.54 mg/l	0.031mg/l	
Barium	10.7 mg/l	3.0 mg/l	
Cadmium	11.6 mg/l	0.045 mg/l	
Chromium /Cr +6	5.13 mg/l 1.0mg/l	0.7 mg/l <1.0 mg/l	
Lead	13.7 mg/l	0.78 mg/l	
Mercury	0.062 mg/l	0.0001 mg/l	
Nickel	3.55 mg/l	1.85 mg/l	
Selenium	<0.002 mg/l	0.024 mg/l	
Silver	0.26 mg/l	0.135 mg/l	
Copper	6.31 mg/l	0.85 mg/l	
Molybdenum	5.52 mg/l	2.05 mg/l	
Zinc	76.7 mg/l	0.845 mg/l	
Heating Value	Flash Point > 140F		
Ignitability	Waste is NOT ignitable, per 75.261	(g) (2)	
Corrosivity	Waste IS corrosive, per 75.261	(g) (3)	
Reactivity	Waste is NOT reactive, per 75.261	(g) (4)	
Total Organic Halogens	8.4 mg/l	1.1 mg/l	
COD	19,880 mg/l	13,050 mg/l	
TOC	20,460 mg/l	11,790 mg/l	

DATE: _____

ANALYSIS COMPLETED BY: _____

SCP-Carlstadt

Aqueous composite

Lab Analysis 2326

This waste is being generated from the clean up of a reclamation site in Carlstadt, New Jersey. The site accepted paint sludges and some oils and solvents. The site reclaimed the oils and solvents and produced a residual solid phase and aqueous phase.

The aqueous portion of the production process was generated from kettle wash outs, tank rinses and distillation processing. Since these tanks did contain materials which are classified as characteristic hazardous waste, under the current regulations, this waste will be considered hazardous as a result of corrosivity, cadmium, chromium and lead.

WASTE CONVERSION INC.
PROCESS DEVELOPMENT LAB.
POSTRUN REPORT

RESULTS OF ANALYSIS

ANAL : DET : METH 1 FILE 26

RUN 36 SCP-AQUEOUS 2.0IL.T. F-2.5 15 : 52.2 2 / 21 / 84

COMPONENT

CONCENTRATION-PPM

NO COMPONENTS DETECTED BY THIS METHOD

ANAL : DET : METH 50 FILE 26

RUN 36 SCP-AQUEOUS 2.0IL.T. F-2.5 15 : 52.2 2 / 21 / 84

COMPONENT

CONCENTRATION-PPM

METHANOL	178.588
ETHANOL	79.298
ACETONE	89.8131
N-PROPANOL	7.3129
METHYL ETHYL KETONE	48.4219
N-BUTANOL	67.5414
3-METHYL-2-PENTANONE	1.8545
M,P-XYLENES	.0635
O-XYLENE	.255

Philip A. Einhorn
PHILIP A. EINHORN
TECHNICAL DIRECTOR

WASTE CONVERSION INC.
PROCESS DEVELOPMENT LAB.
POSTRUN REPORT

RESULTS OF ANALYSIS

ANAL : DET : METH : FILE 25

RUN 35 SOP AQUEOUS-2.DIL.G 15 : 3.6 2 / 21 / 84

COMPONENT	CONCENTRATION-PPM
VINYLDENE CHLORIDE	.5171
TOLUENE	1.6028
ETHYL BENZENE	.8477
ISOPHORONE	4.1386
1,2,4-TRICHLOROBENZENE	.1293

ANAL : DET : METH 50 FILE 25

RUN 35 SOP AQUEOUS-2.DIL.G 15 : 3.6 2 / 21 / 84

COMPONENT	CONCENTRATION-PPM
METHANOL	263.918
ETHANOL	253.392
ACETONE	152.197
N-PROPANOL	578.834
METHYL ETHYL KETONE	5.1796
ETHYL ACETATE	197.356
N-BUTANOL	206.517
1-METHYL-2-PENTANONE	2.8035
N-BUTYL ACETATE	.1195
M,P-XYLENES	.6161
O-XYLENE	.281
N,N-DIMETHYL ANILINE	

Philip A. Einhorn

PHILIP A. EINHORN
TECHNICAL DIRECTOR

S & W Waste, Inc.

115 JACOBUS AVENUE
SOUTH KEARNY, N.J. 07032

Tel: 344-4004

March 1, 1984

Gentlemen:

Attached please find the results of chemical analysis performed on a number of samples taken from your facility at Carlstadt.

Out of a total of 63 drums, 15 contained oil, and the rest, 48, contained either sludge alone or sludge with supernatant aqueous layer.

Two composites were made out of the 15 drums, namely DC0-100 and DC0-200, and each was analyzed for P.C.B'S.

5 Composites were made out of the 48 drums, namely DCS-500, and DCS-600, DCS-700, DCS-800, DCS-900, and each was analyzed for P.C.B'S and E.P. Toxic Metals.

Our findings are summarized in the next pages.

Sincerely yours,



George Apostol
Lab Director

GA/jh

<u>Drum Oil Composites</u>	<u>Drums</u>	<u>#of samples per composites</u>
DCO-100	52,20,32,17,14,15,26,23,25,22	10
DCO-200	2,27,34,38,24	5

<u>Drum Sludge Composite</u>	<u>Drums</u>	<u>#of samples per composites</u>
DCS-500	71,85,82,81,83,96,80,95,97	10
DCS-600	94,48,78,77,74,59,76,75,58,56	10
DCS-700	73,57,62,61,60,72,63,64,66,55	10
DCS-800	7,50,65,68,69,67,43,40,49,45	10
DCS-900	70,46,51,89,92,93,90,91	8

<u>CONTAMINANT</u>	<u>E.P. TOXICITY-LEACHATE CONC. (mg/l)</u>					<u>MAX CONC. ALLOWED</u>
	DCO-500	DCO-600	DCO-700	DCO-800	DCO-900	
ARSENIC	0.002 ND	0.002 ND	0.002 ND	0.002 ND	0.002 ND	5.0
BARIUM	0.08 ND	0.08 ND	0.08 ND	0.08 ND	0.08 ND	100.0
CADIUM	4	4.185	5.25	10.0	1.250	1.0
CHROMIUM	.125	.150	.150	.350	0.04 ND	5.0
LEAD	2.15	2.75	2.25	0.900	1.050	5.0
MERCURY	0.002 ND	0.002 ND	0.002 ND	0.002 ND	0.002 ND	0.2
SELENIUM	0.002 ND	0.002 ND	0.002 ND	0.002 ND	0.002 ND	1.0
SILVER	0.01 ND	0.01 ND	0.01 ND	0.01 ND	0.01 ND	5.0

COMPOSITE#

DCO-100
DCO-200

DCO-500
DCO-600
DCO-700
DCO-800
DCO-900

CONTAMINANT

1.7 mg/kg as arochlor 1260
1.7 mg/kg as arochlor 1260

32 mg/kg as arochlor 1260
36 mg/kg as arochlor 1260
34 mg/kg as arochlor 1260
33 mg/kg as arochlor 1260
24 mg/kg as arochlor 1260